## UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MASSACHUSETTS

DIONNE RICHARDS,  Plaintiff,	) ) )
V.	) Case No.: 1:24-cv-10494-RGS
EXPERIAN INFORMATION	) case No.: 1.24-ev-104)4-RGS
SOLUTIONS, INC., et al.	)
Defendants.	)
	)

## DEFENDANT PENNSLYVANIA STATE EMPLOYEES CREDIT UNION'S MOTION TO COMPEL PLAINTIFF'S INITIAL DISCLOSURES

Defendant Pennsylvania State Employees Credit Union ("PSECU"), pursuant to Fed. R. Civ. P. 37(a)(3)(A) and this Court's April 2, 2024, Order (ECF 34), hereby respectfully moves to compel Plaintiff Dionne Richards ("Plaintiff") to provide forthwith initial disclosures as ordered by the Court and in the manner as required by Fed. R. Civ. P. 26(a)(1)(A)(ii)-(iii). In further support, PSECU respectfully refers the Court to its attached memorandum of law, incorporated herein.

WHEREFORE, for the foregoing reasons and the reasons set forth in its accompanying Memorandum of Law, Defendant PSECU respectfully requests that the Court grant its motion; and enter any and all such other relief for PSECU as the Court deems just and appropriate.

Respectfully submitted,

Defendant,
PENNSYLVANIA STATE EMPLOYEES CREDIT
UNION,
By its attorneys,

/s/ Christian B.W. Stephens

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Dated: May 22, 2024

## **LOCAL RULE 7.1 CERTIFICATION**

I hereby certify that counsel for PSECU conferred with the Plaintiff via email on May 21 and May 22, 2024, in a good faith attempt to resolve or narrow the issues presented by this motion.

/s/ Christian B.W. Stephens
Christian B.W. Stephens

## **CERTIFICATE OF SERVICE**

I hereby certify that this document(s) filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and copies will be sent via email and U.S. mail, postage prepaid, to the following party who is a non-registered participant:

Dionne Richards 11 High Street, Suite #2 Milton, MA 02186 dionnerichardson54@yahoo.com

> /s/ Christian B.W. Stephens Christian B.W. Stephens